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March 4, 2004

VIA UPS AND EMAIL

Ms. Mary Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, Massachusetts 02110

Re: DTE 03-60: Proceeding by the Department of Telecommunications and Energy  
on its Own Motion to Implement the Requirements of the Federal  
Communications Commission's *Triennial Review Order* Regarding Switching  
For Mass Market Customers

Dear Ms. Cottrell:

Broadview Networks, Inc., Bullseye Telecom, InfoHighway Communications Corporation, McGraw Communications, Inc., and Metropolitan Telecommunications, Inc. (the "CLEC Coalition") and DSCI Corporation, through counsel, hereby submit this Motion for Leave to File Reply Testimony of Joseph P. Gillan in the above-referenced proceeding before the Massachusetts Department of Telecommunications and Energy. Enclosed please find an original and nine (9) copies of this Motion, a duplicate filing and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided.

Please feel free to contact the undersigned counsel at (202) 887-1211 if you have any questions regarding this filing.

Respectfully submitted,

  
Brett Heather Freedson

*Counsel to the CLEC Coalition and  
DSCI Corporation*

cc: Paula Foley, Hearing Officer  
Service List (via email)

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of	)	
Telecommunications and Energy on its own	)	
Motion to Implement the Requirements of	)	D.T.E. 03-60
the Federal Communications Commission's	)	
<u>Triennial Review Order</u> Regarding	)	
Switching for Mass Market Customers	)	
	)	

**MOTION OF THE CLEC COALITION AND DSCI CORPORATION  
FOR LEAVE TO FILE REPLY TESTIMONY OF JOSEPH P. GILLAN**

Broadview Networks, Inc., Bullseye Telecom, InfoHighway Communications Corporation, McGraw Communications, Inc. and Metropolitan Telecommunications, Inc. (together, the "CLEC Coalition") and DSCI Corporation, through counsel, hereby submit this Motion for Leave to File the Reply Testimony of Joseph P. Gillan, and accordingly, request that the Reply Testimony of Joseph P. Gillan dated February 25, 2004 ("Gillan Reply Testimony") be entered into the record in the above-captioned proceeding before the Massachusetts Department of Telecommunications and Energy (the "Department"). In support of this Motion, the CLEC Coalition submits as follows:

The Gillan Reply Testimony briefly and narrowly responds to specific issues discussed in the testimony filed on behalf of MCI in the above-captioned proceeding that are essential to the Department's definition of the "mass market" for the purpose of applying the "trigger analysis" set forth in the Federal Communications Commission's Triennial Review Order. Accordingly, the Gillan Reply Testimony is necessary to develop a complete factual record in the above-captioned proceeding, and the Department's grant of this Motion would not unduly prejudice any party to this proceeding.

WHEREFORE, the CLEC Coalition and DSCI Corporation respectfully request that the Department grant this Motion for Leave to File the Reply Testimony of Joseph P. Gillan, and accordingly, that the Department enter the Reply Testimony of Joseph P. Gillan dated February 25, 2004 into the record in the above-captioned proceeding.

Respectfully submitted,



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